

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 25-80156-cr-DMM

UNITED STATES OF AMERICA

v.

JORGE IBARRA,

Defendant.

FACTUAL PROFFER

Defendant Jorge Ibarra, (hereinafter referred to as the “defendant”), his counsel, and the United States agree that, had this case proceeded to trial, the United States would have proven the following facts, which occurred in Palm Beach County in the Southern District of Florida, beyond a reasonable doubt, and that the following facts are true and accurate and are sufficient to support a plea of guilty:

1. On April 27, 2023, an adult female (hereinafter “Victim 1”) called the FBI National Threat Operations Center (hereinafter “NTOC”) to report receiving harassing and threatening text messages from more than 100 hundred different phone numbers for the past year. Victim 1 advised that on the date of her report to NTOC, an unknown subject, later identified as the defendant, threatened to “slit the throat” of Victim 1’s four-year-old niece, who the unknown subject believed to be Victim 1’s daughter. The defendant also threatened to kidnap Victim 1’s niece to sell her overseas. Victim 1 reported that the frequency and severity of the threats of violence in the text messages had escalated recently. She reported the threatening messages to her local police department previously.

2. In May 2023, FBI Atlanta Division interviewed Victim 1. In addition to the information reported previously, Victim 1 stated that she believed that one person sent the hundreds of harassing and threatening messages, due to the similar language in the messages and the bad grammar. Law enforcement later identified the defendant as the sender of all the threatening messages to Victim 1. Victim 1 believed she was targeted her due to her role as a commentator for a political news organization. Victim 1 eventually obtained a new telephone number to thwart further contact by the unknown subject.

3. After the initial reporting, Victim 1 continued to provide additional incoming messages to the FBI. In October 2023, agents from the FBI Atlanta Division forensically extracted text messages from Victim 1's phone with her consent. A sample of the messages are provided below:

Approximate Date	Phone Number	Message
3/4/2023	334-645-2746	[Victim 1] we need to gain more views on rumble we have only 104k views and 46 chats ... And 3.3k on YouTube ... We are on apple charts as #187 of our app rates
5/13/2023	334-621-7536	Intel .. please tweet truth instagram out to everyone to leave huge tornados on the way we need to send out a advisory to all of your viewers.. very important...
5/13/2023	747-236-5162	Ms:[Victim 1] nices books you have near your coffee area we have a very close eye on your daughter you fuck up next time you go live we promise you your never gonna see her again. So don't play games with us when we tell you jump you say how high got it. WoW you have a beautiful house love all the decorations and all the mypillows you have. We know everything about you we have been holding back we keep our word you fuck up one more time it's over for your daughter don't take this lightly action on it as we say it
5/13/2023	770-863-8629	Illuminati Elite team we will be watching today your daughter has your mothers spirit already ok happy early Mother's Day and make sure you show your boobs including your nipples in away it's not noticeable ok we will tune in. In rumble

7/17/2023	561-336-6743	We are giving you a heads up because you followed up on our deal [Victim 1] will be in the line of fire if she don't follow through in the next 48hours do not be around her shit is about to get nasty get away now if you are around her . Illuminati elite team. Part of your deal and our promise we would hold off and spare you and your loved ones that still stands that's why you where just given a warning warning ...
10/10/2023	786-446-9621	[Victim 1] you better shut the fuck up and stop posting shit on instagram before your lil princess brains is all over the fucking floor to stop now or we will show you fat bitch
10/10/2023	786-446-9621	[Victim 1] you better shut the fuck up and stop posting shit on instagram before your lil princess brains is all over the fucking floor to stop now or we will show you fat bitch

4. On May 10, 2023, an adult female (hereinafter "Victim 2") called NTOC and reported having received harassing and threatening text messages from an unknown subject since approximately March 2023. Law enforcement later identified the subject as the defendant. Victim 2 worked for the same news organization as Victim 1. Victim 2 reported that she began receiving the messages after attending a work conference in Washington, D.C. Victim 2 believed that she received the messages due to her professional affiliation. Victim 2 described having received text messages from approximately 10 to 15 different phone numbers. Some of the messages pertained to Victim 2's work in politics. Other messages threatened to rape Victim 2 and indicated that Victim 2 had a bounty on her head. Victim 2 reported the threatening messages to her local police department approximately two weeks earlier.

5. In May 2023, FBI Tampa Division interviewed Victim 2. In addition to the information provided previously, Victim 2 stated she had also received harassing and threatening messages on the online messaging application, Telegram, for approximately two years. Victim 2's coworkers, including Victim 1, also received threatening and harassing communications. Some of the text messages referred to Victim 2 being physically harmed, trafficked, or raped. Victim 2 provided screenshots of some of the messages to FBI Tampa Division.

6. In June and July 2023, Victim 2 continued to provide additional incoming messages to the FBI. A sample of the messages are provided below:

Approximate Date	Phone Number	Message
3/4/2023	334-645-2746	[Victim 2] please do interviews today and get people to download our app ... studio HQ
3/4/2023	334-645-2746	[Victim 2] we need to gain more views on rumble we only have 104k views and 46 chats And 3.3k on YouTube We are on apple charts as #187 of our app rates Studio HQ
4/18/2023	334-645-2746	Tonight your getting it your neighbour has all your details
4/27/2023	413-436-6697	Illuminati Elite team . A of today you have a \$80,000,000 bounty on your head America is hungry your done we gave you enough time to submit..
4/27/2023	413-307-5726	[Victim 2] You officially on the bounty [wager \$80,000,000] will increase every hour your completely done remember your on the global bounty market now there's no more running you made it this way
5/1/2023	770-824-6487	[Victim 2] you need to listen up right now this is 1,000% guaranteed it can happen im giving you a early heads up so don't take this lightly ok my boss put out a bid for you \$10,000,000-\$20,000,000 I don't know how your gonna take this and if this but you where sold to a over seas master in Europe Amsterdam the owner paid \$75,000,000 for you ... If they find you and capture you it's all over my recommendation is stay off grid and start moving now somewhere eles you don't have much time [clock emoji] this is 1,000% true and it's happening do not take this lightly ok illuminati elite team
5/2/2023	747-755-3641	[Victim 2] I told you to stay off grind and you keep posting when they find you and fuck your brains out don't cry I told you [you have a 20,000,000 bounty on your head and you where sold over seas to Amsterdam Europe stop fucking around]
5/6/2023	647-362-6116	[Victim 2] good looking ass you have when you shower so sexy
5/8/2023	760-350-6346	Dam [Victim 2] what a good looking [two eye emoji] pussy you have WoW I am blown away please bend some in the shower [showerhead emoji] spread your ass a bit when you soap [soap emoji] it [tongue emoji][smiley face with tongue sticking out emoji][smiley face with tongue sticking out the side of the mouth emoji]

5/15/2023	760-350-6494	The Illuminati elite team. We have all 7 of your addresses. [Victim 2's addresses listed here] And all your family members you tell me if you truly wanna play games with us
6/6/2023	770-857-3217	Wake up [Victim 2]. Get up and drink a glass of this type of milk it's 85 years old. [milk glass emoji] and start feeding context it's time [clock emoji] me and my buddy send you this one. [Two photographs were attached to this depicting a naked elderly man masturbating and ejaculating]

7. After speaking with law enforcement, Victim 1 and Victim 2 continued to receive numerous harassing and threatening messages from the defendant. A sample of the messages are provided below:

Victim	Approximate Date	Phone Number	Message
V2	3/18/2024	334-352-4334	We are the Illuminati Secret society if you don't obey us well send a team to you house to take you away. From your family
V2	3/19/2024	786-446-9515	[Victim 2] you have 5h left to obey us before we put all your information out go on true social or instagram post something dark that tells us your with the Illuminati
V1	5/30/2024	704-271-4885	We have his ass now 34 counts now we are gonna after you and [Victim 2] be ready..... Illuminati
V1	7/9/2024	786-446-9515	[Victim 1] we have exclusive nudes of you in the shower and many other places we are gonna expose you and send it to everyone in the Florida rally today everyone's phone will see it Uploading now 10 9 8 7 6 5 4 3
V2	7/9/2024	786-446-9515	[Victim 2] we have exclusive nudes of you in the shower and many other places we are gonna expose you and send it to everyone in the Florida rally today everyone's phone will see it

V2	7/9/2024	239-210-5696	[Victim 2] we have exclusive nudes of you in the shower and many other places we are gonna expose you and send it to everyone in the Florida rally today everyone's phone will see it
V2	9/24/2024	310-307-2454	Hey
V2	10/17/2024	786-864-3274	[Victim 2's address] is being watched by our team one slip tonight and your fired I have your approval to fire you already ok we will send you a formal firing letter [envelope emoji] to your home if you slip up tonight cheat speed and do your Dam job
V1	10/24/2024	706-666-9542	[image depicting two women eating what appears to be feces] [image depicting an elderly male perform fellatio on another adult male] [image depicting an elderly male perform fellatio on an unknown aged male] [image depicting an elderly male perform fellatio on another adult male] My favourite enjoy [image depicting the genitals of an elderly female] [image depicting an elderly male ejaculating] Shit in mouth so lovely [image depicting the same two women from the first photograph eating what appears to be feces]

V1	10/25/2024	334-605-6679	<p>Chief Operating Officer-RSBN studio [smiley face emoji] when you get a chances make Kamala Harris the main topic our last rally got a super boost with views because of thatLove ya -> from G</p> <p>Chief Operating Officer-RSBN studio the boss said the weird that was doing stuff to you he said the case will come to a close with a arrest and 5 years jail time for doing it to other people in our team to I always have your back ... Love ya -> from G</p> <p>What a relief Jesus Christ . thank you for making it possible.</p> <p>Before your NYC flight [airplane emoji] I will send you a direct link to the court stream where the criminal will get sentenced on live.</p> <p>He also molested 7 under age girls look at the camera and make a look if you agree for testicle removal in the court system so the order passes they need one more person to say yes</p> <p>Done testicle removal will pass in 15m</p> <p>Celebrate [three champagne bottle emojis], big tonight, the harassments are done forever.</p> <p>He even molested a 75 year old lady [sad face emoji] that's messed up</p> <p>When you go back on camera do a special sign with your hands to send you the court live stream ok so you can see everything the judge says and more</p> <p>Put a real strong execution voice so they know we agree in the order judge watching now</p> <p>Great job</p>
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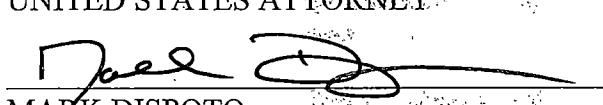
8. By sending these messages, the defendant intended to harass and intimidate Victim 1 and Victim 2, and did place them and others in reasonable fear of death or serious bodily injury.

9. On November 22, 2024, agents executed a search warrant at the defendant's residence. During the search, agents seized the defendant's cellular telephone and other electronic devices. On site, they confirmed that the defendant's computer contained at least one of the messaging apps used to threaten the victims.

10. During a post-*Miranda* interview, the defendant admitted that he sent threatening and harassing messages to Victim 1 and Victim 2 from as far back as 2020 or 2021. This information is consistent with both Victims reporting to the FBI. The defendant explained that he saw the victims broadcasting the news a pro President-Elect Donald J. Trump news station. The defendant began sending the messages out of "stupidity" and because he felt "bored." The defendant acknowledged that his messages were "horrific," and he felt bad afterwards.

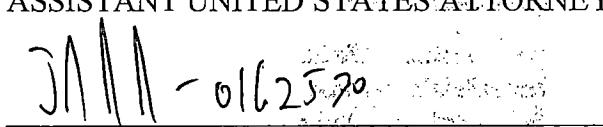
HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY

Date: 2/18/25

By: 

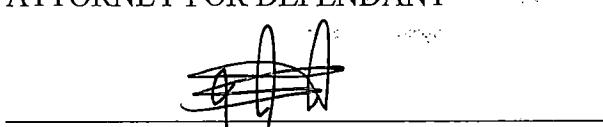
MARK DISPOTO
ASSISTANT UNITED STATES ATTORNEY

Date: 2-18-25

By: 

JACOB COHEN
ATTORNEY FOR DEFENDANT

Date: 2-18-25

By: 

JORGE IBARRA
DEFENDANT